

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Pennsylvania

United States of America

v.

Tyrone Curtis

Case No. 21-MJ-920

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*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 7, 2021 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section**Offense Description*

Title 18 U.S.C. Section 922(g)(1)

Possession of a Firearm by a Felon

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

/s/ John Krewer

*Complainant's signature*

John Krewer, TFO FBI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 05/26/2021

/s/ Richard A. Lloret

*Judge's signature*

City and state: Philadelphia, PA

Hon. Richard A. Lloret, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, John A Krewer, Task Force Officer, Federal Bureau of Investigation (“FBI”), Philadelphia, Pennsylvania, being duly sworn, state:

**A. INTRODUCTION**

1. I am an “investigative or law enforcement officer” as defined in 18 U.S.C. § 3051, as such, I am a law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), and am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in 18 U.S.C. § 2516.

2. I am a Task Force Officer (“TFO”) with the FBI, Philadelphia Field Division and have been detailed here since November of 2015. I have received specialized training from the FBI, Drug Enforcement Agency, Pennsylvania Attorney General’s Office, and the Philadelphia Police Department, including training in the investigation and identification of narcotics traffickers and violent gangs. During my tenure with the FBI, I have been assigned to the High Intensity Drug Trafficking Area/Safe Streets Violent Drug Gang Task Force of the Philadelphia Division, which investigates, among other violations of federal law, violent drug gangs and criminal organizations including those involved in the importation, distribution and manufacturing of controlled substances, Hobbs Act violations, outlaw motorcycle gangs, and homicides and shootings resulting from the drug trade. Prior to being detached from the Philadelphia Police Department and detailed to the FBI, I was assigned to the Criminal Intelligence Unit within the Philadelphia Police Department from June of 2014 to November of 2015. In the Criminal Intelligence Unit, I investigated violent street gangs within the city and arrested several gang members for homicide, attempted murder, narcotics trafficking and witness intimidation both locally and federally. Prior to being assigned to the Criminal Intelligence Unit,

I was assigned to the 12th Police District in Southwest Philadelphia from June of 2009 to June of 2014. My last two years in the 12th District I was assigned to the 12th District “five squad tactical squad.” In this squad, we focused on curbing gun violence in the community by proactive policing to confiscate firearms off the streets of our community. As a police officer and TFO, I have investigated numerous firearms violations, drug violations, and other related crimes. I have conducted physical and electronic surveillance, debriefed confidential sources, analyzed information obtained from court-authorized pen register and trap and trace intercepts, and participated in the drafting and execution of search warrants involving these matters. I am an active investigator for the FBI Gangs and Criminal Enterprise Program in which state and local arrests for drugs and firearms violations are reviewed and referred for possible federal prosecution.

3. Based on the facts set forth below, I have probable cause to believe that TYRONE CURTIS committed the following violation within the Eastern District of Pennsylvania: 18 U.S.C. § 922(g)(1) (felon in possession of firearm).

### **DETAILS OF THE INVESTIGATION**

4. In April 2021, the FBI received information from a Confidential Human Source (“CHS”)<sup>1</sup> regarding a male illegally selling a firearm. On April 7, 2021, TFO Michael Guinter and other task force members met with the CHS near 2200 Oregon Avenue in Philadelphia to conduct a controlled purchase of a firearm. Officers searched the CHS for contraband prior to the operation with negative results, and provided them with \$1,600. The CHS waited outside of

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<sup>1</sup> The identity of the CHS is known to me and the information provided by the CHS has been reliable. Between March of 2017 to February of 2019, and then again most recently from November of 2020 to present, the CHS has provided information that has been corroborated by other independent sources. The information provided by the CHS has proven to be reliable and accurate. The CHS has provided information regarding other crimes, including illegal drug trafficking, and illegal firearms trafficking. The CHS has prior convictions for unauthorized use of a motor vehicle, possession of a controlled substance, DUI, possession with intent to deliver and receiving stolen property. The CHS is and has been providing information to law enforcement for monetary compensation.

Snipes Sneaker Store.

5. A black Chevrolet Silverado pulled into the parking lot in front of the store. Two black males exited the vehicle. One of the males was wearing a white hooded sweatshirt and black pants and was later identified as TYRONE CURTIS. The other male was wearing a black tee shirt and blue jeans and was later identified as Moussa Kamara.

6. CURTIS approached the CHS and engaged in conversation. He told the CHS that the price for a Glock handgun was \$1,750. The CHS left the area to obtain the additional \$150 from the FBI, and then returned to the front of the store where CURTIS was waiting. The CHS gave CURTIS \$1,750 in exchange for a white Footlocker bag containing a red shoebox. The CHS put the bag in the trunk of his/her vehicle and left the area. The CHS met with TFO Guinter, who took the Footlocker bag and recovered a black, Glock, model 48, 9mm semi-automatic pistol, bearing serial number BSNV815. The CHS was again searched for contraband with negative results.

7. After the controlled purchase Philadelphia Police attempted to stop the Chevrolet Silverado at the 2500 block of South 63rd Street, but the vehicle fled, going eastbound on the 6300 block of Wheeler Street. Officers observed two black objects thrown from the window of the car as it fled. Officers later found a black, FN, model 509, semi-automatic pistol, serial number GKS0103792, loaded with 24 rounds of ammunition, and a black, Glock, model 48, 9mm semi-automatic pistol, bearing serial number BSNR276, on the 6300 block of Wheeler Street.

8. TFO Jason Yerges was patrolling in the area and saw CURTIS and Kamara standing near 62nd and Elmwood Street. Other task force members came to the area and

CURTIS and Kamara were taken into custody.<sup>2</sup> The vehicle was found a block away. CURTIS gave a post-*Miranda* statement and admitted to selling the Glock handgun and possessing the FN and Glock handguns that were thrown from the vehicle.

9. Glock firearms are manufactured in either the Republic of Austria or in Smyrna, Georgia. FN firearms are manufactured in Columbia, South Carolina. The firearms therefore travelled in and affected interstate commerce by crossing state lines into the Commonwealth of Pennsylvania. All three of the firearms recovered meet the definition of a firearm under 18 U.S.C. § 921(a)(3).

10. A criminal records check showed that CURTIS has five prior felony convictions, including a 2012 conviction in Delaware County for possession with intent to distribute a controlled substance, possession of a firearm by a prohibited person, and receiving stolen property, for which he was sentenced to five to ten years confinement and a 2002 conviction in Philadelphia for aggravated assault and criminal mischief for which he received six to twenty-three months confinement.

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<sup>2</sup> Kamara is charged in state court with carrying firearms without a license. He does not have any prior criminal convictions that would allow for federal prosecution.

**CONCLUSION**

11. Wherefore, based on my training and experience, and my knowledge of the investigation, I have probable cause to believe, and do so believe, that TYRONE CURTIS committed the following violation: 18 U.S.C. § 922(g)(1) (felon in possession of firearm).

/s/ John Krewer

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Task Force Officer John A Krewer  
Federal Bureau of Investigation

Subscribed and sworn to before me  
on May 26, 2021

/s/ Richard A. Lloret

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Honorable Richard A. Lloret  
United States Magistrate Judge